



Received & Inspected

FEB 01 2011

FCC Mail Room

8603 E. Royal Palm Road, Suite 210
Scottsdale, AZ 85258

O: 480.422.0110 • 866.411.C3IP
Fax: 480.659.8705
www.c3ipcommunications.com

January 20, 2011

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: **C3IP Communications, LLC** – WC Docket No. 06-122
Request for Waiver /USAC Invoice No. UBDI0000438785
Filer ID # 825991 /FRN Registration No. # 0015-33-7439

Dear Sir or Madam:

On August 18, 2010, we filed an appeal with the USAC of the invoice dated July 22, 2010, based on two factors. The first being that during an audit, we found that we had mistakenly greatly overstated our revenue on the May 499-Q. Our contribution, using the USAC's calculations, should have been approximately \$1,832 for each of the three months. The second factor was that C3IP was being penalized for not filing 499-Q reports in 2009 when it was still de minimis and paying our underlying carrier, CommPartners, LLC, for USF until May 2010. We submitted copies of our invoices from CommPartners for April and May 2010 which showed USF charged in April, but not in May, when the company became non de minimis. We also submitted a letter from CommPartners' Controller attesting to the fact that CommPartners was charging C3IP USF through April 2010.

To date, our appeal has still not been addressed by USAC, and we are getting delinquent notices from USAC that our account is past due. It would be an extreme hardship on the Company to pay this invoice and is just not a possibility. C3IP is a relatively small resale telecom provider and having to front this amount of money due to an error in reporting would be an extreme hardship and put the company's continuation in this industry as a telecommunication provider at risk.

You may reach me at our company address or by e-mail at cmiller@c3ipcommunications.com or at 480-422-1738.

Sincerely,

Cory Miller
Principal

cc: USAC

No. of Copies rec'd 0
LHM ABCDE



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FEB 03 2011

FOC Mail Room

8603 E. Royal Palm Road, Suite 210
Scottsdale, AZ 85258

O: 480 422 0410 • 866 414 C3IP

Fax: 480 859 8705

www.c3ipcommunications.com

August 18, 2010

Universal Service Administration Company
Letter of Appeal
Billing, Collections and Disbursements
2000 L Street, N.W., Suite 200
Washington, DC 20036

Re: *C3IP Communications, LLC's Appeal of Invoice No. UBDI0000432812*
Filer ID # 825991/ FRN Registration No. # 0015-3374-39
Docket No. 96-45

Dear Sir or Madam:

C3IP Communications, LLC is writing to appeal the invoice dated July 22, 2010, based on the May 2010 499-Q filing. We understand that we are past the 45-day window to revise our May 499-Q filing, and are therefore, filing this appeal.

We did not realize that we had mistakenly overstated our revenue on the May 2010 499-Q filing until we received this invoice and performed an audit of both our 2009 and 2010 revenues.

We just submitted a revision to our 2009 499-A filing and have filed an accurate 499-Q for the second quarter 2010. Using the USAC calculations to determine the monthly contribution for the first quarter, we show that we should have owed approximately \$1,832 for each of these months.

We are also appealing the adjustments that were calculated from our April 499-A filing for 2009 revenue which appear to be the result of not filing 499-Qs in 2009. C3IP Communications, LLC was a de minimis carrier until earlier this year when we notified our underlying carrier, CommPartners, LLC (Filer ID# 825445) of our change in USF status. CommPartners had been paying into USF on our behalf until May of 2010. Enclosed is a letter from CommPartners' Controller stating that they had been billing us for USF through April 2010. Also enclosed are copies of our April and May bills. The USF charge appears on the April bill, but not on the May bill when our status was changed to non de minimis.

C3IP Communications apologizes for the inaccuracies in reporting the 499-A and 499-Q for the first quarter. We are new at having to file on our own and finding it complicated trying to figure out how to do it accurately. Pending the outcome of this appeal, we do want to fulfill our contributions obligation and therefore have sent payment via Federal Express in the amount of \$6,248.88 on August 11, 2010. We request that a credit be issued toward our remaining first quarter obligations.

We are also facing the same issue with the TRS invoice from NECA which is almost \$3,000. C3IP is a relatively a small company and does not have the financial means to support paying these huge invoices.

Universal Service Administration Company
August 18, 2010
Page Two

Please direct your response to me at the contact information listed below.

Cory Miller
C3IP Communications, LLC
8603 E Royal Palm Road, Ste. 210
Scottsdale, AZ 85258
480-422-1738
cmiller@c3ipcommunications.com

Thank you for your assistance in this matter.

Sincerely,



Cory Miller
C3IP Communications, LLC

Enclosures

cc: NECA



Filer 499 ID: 825991
 Invoice Number: UBDI0000432812
 Statement Date: 07/22/2010
 New Balance: \$ 23,940.20
 Payment Due Date: 08/13/2010
 Amount Enclosed: **6,248.88**

C3P Communications LLC
 Attention: Cory Miller
 8603 E. Royal Palm Rd., Suite 210
 Scottsdale, AZ, 85258

Mail Payment To:

Universal Service Administrative Company
 PO Box 105056
 Atlanta, GA 30348-5056

Address Change? See reverse side for instructions.

☐ If paying for multiple Filer 499 IDs, please check here and complete form on back.

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

STATEMENT OF ACCOUNT

Date	Description	Charges	Credits
	Previous Balance		(\$205.54)
07/15/2010	Rural Health Care Support Mechanism Charges	\$106.60	
07/15/2010	Rural Health Care Support Mechanism Adjustment - 2010 499A	\$305.30	
07/15/2010	Low Income Support Mechanism Charges	\$1,041.70	
07/15/2010	Schools & Libraries Support Mechanism Charges	\$1,670.85	
07/15/2010	Low Income Support Mechanism Adjustment - 2010 499A	\$2,983.44	
07/15/2010	High Cost Support Mechanism Charges	\$3,429.73	
07/15/2010	Schools & Libraries Support Mechanism Adjustment - 2010 499A	\$4,785.34	
07/15/2010	High Cost Support Mechanism Adjustment - 2010 499A	\$9,822.78	
TOTAL OUTSTANDING USAC BALANCE AS OF 7/15/2010		\$23,940.20	

Transactions occurring after 07/15/2010 are not reflected on this statement.

Under the Debt Collection Improvement Act of 1996 (Pub. L. 104-134) (DCLIA), your BALANCE DUE is a demand that you pay a DEBT owed to the United States on or before the DUE DATE. If the DUE DATE is non-business day, payment must be received the business day before that date. Any portion of the DEBT unpaid after the DUE DATE is a DELINQUENT DEBT, which may result in sanctions, including interest, penalties, and administrative charges. Failure to file a Telecommunications Worksheet may result in a late filing fee DEBT added to your BALANCE DUE. Read the reverse of this Invoice for important information about those sanctions and your legal rights and obligations.

Statement Date 07/22/2010	Invoice Number UBDI0000432812	Filer 499 ID 825991	Balance Due USAC \$ 23,940.20
FORM 499Q DATA This month's support mechanism charges were calculated using an FCC contribution factor of 0.136000 and the following revenue data: <div style="display: flex; justify-content: space-between;"> <div>May 2010 499Q</div> <div></div> </div> <div style="display: flex; justify-content: space-between;"> <div>120b</div> <div>\$133,310.00</div> </div> <div style="display: flex; justify-content: space-between;"> <div>120c</div> <div>\$23,525.00</div> </div> If the figures do not correspond with your records, please contact USAC Customer Service at 888-641-8722		PAYMENT INFORMATION All payments received (regardless of specific instructions) will be applied to your outstanding USAC balance in historical order as outlined in FCC order 07-150. Please remit ACH payments in a CCD+ format to ABA #071000039, Account #5590045653. All Wire Transfers should be sent to ABA #026009593, DDA (or Account) #5590045653. Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	

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FCC Mail Room



July 27, 2010

USAC
2000L Street N.W., Suite 200
Washington, DC 20036

Re: C3IP Communications, LLC
Filer ID # 825991

Dear Sir or Madam:

On behalf of our wholesale customer, C3IP Communications, LLC, CommPartners, LLC (filer ID # 825445) is hereby submitting this signed statement stating that CommPartners, LLC was paying into the Universal Service Fund on behalf of C3IP from the beginning of their business in June 2008 through April 2010. CommPartners was notified that the company was no longer de minimis and C3IP then assumed responsibility for paying directly into the USF beginning in May 2010.

Attached is a copy of C3IP's April bill showing our USF billing to them (on line 66) and the May billing showing that CommPartners was no longer billing for USF.

If you need any additional information, please feel free to contact me at 702.367.8647 X1020.

Sincerely,



Gregory Gritton
Controller

GG:/cl

Enclosures

8350 S Durango Dr., Ste. 200
Las Vegas, NV 89118
Phone: 702.367.8647 ext. 7500
Fax: 702.365.8647
ggritton@commpartnersconnect.com

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**COMM PARTNERS
CONNECT**

8350 S Durango Dr Suite 200 Las Vegas, NV 89113

INVOICE**BILL TO**C3IP Communications, LLC
8603 E. Royal Palm
Suite 210
Scottsdale, AZ 85258

000634 Customer Number
2010-D4-ET-000634 Invoice Number
Reference No.
Invoice Status
04/01/2010 Invoice Date
05/01/2010 Due Date
168,577.44 Past Due
04/01/2010 Billing Period
thru 04/30/2010
38,951.98 Invoice Total

Make all checks payable to CommPartners Network Services, LLC
Please reference the Invoice Number as well as Account ID on check.
If your payment for this invoice is received by the 15th of the month,
you will be eligible for a 2% Early Pay Discount.

If you have any questions concerning this invoice please contact:
CommPartners Billing Department at billing@commpartners.us
Finance charges of 1.5% per month will apply to all unpaid balances.

Wire Instructions

Account Name: CommPartners Network Services, LLC
Bank Name: Bank of America
Account Number: 4970820112
ABA Number: 122400724

Congratulations on earning your Premier Partner discount of 0% on eligible products!! Once you reach \$40,000 in monthly recurring revenue your status will be upgraded to Elite and you will earn a 15% discount on eligible products.

If you need any pre-sales support to help you reach the Premier Partner level, please let us know!

Item	Description	Quantity	Cost/Unit	Recurring/Other/Fees	Taxes	Discount	Total
1	IP FaxSolution Activation(s)	1.00	6.990	6.99			6.99
2	Enterprise Gold Active Seat(s)	6.00	40.000	240.00			240.00
3	Auto Attendant Active Seat(s)	50.00	9.990	499.50			499.50
4	Enterprise Bronze Active Seat(s)	5.00	25.000	125.00			125.00
5	Broadsoft Assistant Active Seat(s)	10.00	1.250	12.50			12.50
6	800 Numbers Active Seat(s)	92.00	2.990	276.08			276.08
7	Add'l DID(1-100) Active Seat(s)	347.00	0.600	173.50			173.50
8	Alternate Number (on-net) Active Seat(s)	1.00	0.500	0.50			0.50
9	Enterprise Premium Active Seat(s) (12-mo Term)	149.00	24.990	3,723.51			3,723.51
10	Enterprise Standard Active Seat(s) (12-mo Term)	28.00	19.990	559.72			559.72
11	Broadworks Call Center Opt 2 Active Seat(s)	2.00	25.000	50.00			50.00
12	VoiceMail Active Seat(s)	32.00	2.990	95.68			95.68
13	E911 Surcharge Active Seat(s)	56.00	2.500	140.00			140.00
14	IPTrunking-SMB Active Seat(s) (12-mo Term)	44.00	15.000	660.00			660.00
15	IPCallRecord Basic Active Feature(s)	7.00	23.000	161.00			161.00
16	IP FaxSolution Active Seat(s)	13.00	6.990	90.87			90.87
17	Toll Free Pay Phone Blocking Activation(s)	2.00	3.500	7.00			7.00
18	Enterprise Premium Active Seat(s)	12.00	25.990	311.88			311.88
19	Auto Attendant Active Seat(s) (12-mo Term)	21.00	7.990	167.79			167.79
20	Alternate Number Active Seat(s)	5.00	3.480	17.45			17.45
21	Enterprise Standard Active Seat(s)	6.00	20.990	125.94			125.94
22	IPSelect Lines Active Seat(s) (12-mo Term)	174.00	26.990	4,696.26			4,696.26
23	IPSelect Extensions Active Seat(s)	233.00	12.990	3,026.67			3,026.67
24	Linksys1 Active Line(s)	2.00	15.000	30.00			30.00
25	Linksys1 911 Active Seat(s)	1.00	10.000	10.00			10.00

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Item	Description	Quantity	Cost/Unit	Recurring/Other/Fees	Taxes	Discount	Total
26	IPFax Overage Activation(s)	155.00	0.070	10.85			10.85
27	Hunt Group Active Seat(s)	30.00	7.990	239.70			239.70
28	Auto Attendant Active Seat(s)	3.00	9.990	29.97			29.97
29	IPSelect Lines Active Seat(s)	7.00	27.990	195.93			195.93
30	IPSelect Lines Active Seat(s)	7.00	27.990	195.93			195.93
31	Call Control Toolbar - MRC Active Seat(s)	3.00	1.250	3.75			3.75
32	IPSelect Extensions Active Seat(s) (12-mo Term)	258.00	11.990	3,213.32			3,213.32
33	Receptionist Console Opt 1 Active Seat(s)	1.00	35.000	35.00			35.00
34	Broadworks Call Center ACD Active Seat(s)	6.00	39.990	239.94			239.94
35	800 Numbers Activation(s)	2.00	5.000	10.00			10.00
36	Enterprise Premium Active Seat(s)	1.00	25.990	25.99			25.99
37	DID Reservation Active Seat(s)	3.00	0.500	1.50			1.50
38	Instant Group Calling Active Seat(s) (12-mo Term)	1.00	6.990	6.99			6.99
39	Class 5 Feature Package Active Seat(s)	11.00	3.990	43.89			43.89
40	Broadsoft Receptionist Enterprise Active Seat(s)	1.00	59.990	59.99			59.99
41	IPTrunking Basic - Unlimited Active Seat(s) (12-mo Term)	66.00	23.990	1,583.34			1,583.34
42	Broadsoft Receptionist SM9 Active Seat(s)	1.00	39.990	39.99			39.99
43	IPTrunking Basic - 1000 Flat Active Seat(s) (12-mo Term)	24.00	14.990	359.76			359.76
44	IPTrunking Basic - Unlimited Active Seat(s)	10.00	24.990	249.90			249.90
45	LNP Charge (less than 500) Activation(s)	9.00	4.000	36.00			36.00
46	Instant Group Calling Active Seat(s)	1.00	8.990	8.99			8.99
47	early term CP033110-147850			443.80			443.80
48	IP FaxSolution Prorated First Month			6.54			6.54
49	PriorityAccessT1 -12 Active Seat(s)			7,402.92			7,402.92
50	Gold Seat Rate Promo					(90.00)	(90.00)
51	Conference Bridge Calling			54.51			54.51
52	Inbound Toll Free Calls			5,828.33			5,828.33
53	International Calling			134.07			134.07
54	Enterprise Premium Prorated First Month (12-mo Term)			41.11			41.11
55	Long Distance Calling			11.60			11.60
56	Auto Attendant Prorated First Month			20.62			20.62
57	Directory Assistance Calling			16.80			16.80
58	IPSelect Lines Prorated First Month			19.86			19.86
59	IPSelect Extensions Prorated First Month			27.66			27.66
60	Call Control Toolbar - MRC Prorated First Month			2.66			2.66
61	E911 Surcharge Prorated First Month			1.77			1.77
62	800 Numbers Prorated First Month			2.80			2.80
63	Class 5 Feature Package Prorated First Month			3.74			3.74
64	PriorityAccessT1 -12 Prorated First Month			244.84			244.84
65	PriorityAccessT1 -12 Activation(s)			865.00			865.00
66	Universal Service Fee (USF)			2,145.78			2,145.78
			Totals				38,961.99

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**COMMPARTNERS
CONNECT**

8350 S Durango Dr Suite 200 Las Vegas, NV 89113

INVOICE**BILL TO**C3IP Communications, LLC
8603 E. Royal Palm
Suite 210
Scottsdale, AZ 85258

000634 Customer Number
2010-05-ET-000634 Invoice Number
Reference No.
Invoice Status
05/01/2010 Invoice Date
05/31/2010 Due Date
138,577.44 Past Due
05/01/2010 Billing Period
thru 05/31/2010
36,519.60 Invoice Total

Make all checks payable to CommPartners Network Services, LLC
Please reference the Invoice Number as well as Account ID on check.
If your payment for this invoice is received by the 15th of the month,
you will be eligible for a 2% Early Pay Discount.

If you have any questions concerning this invoice please contact:
CommPartners Billing Department at billing@commpartners.us
Finance charges of 1.5% per month will apply to all unpaid balances.

Wire Instructions

Account Name: CommPartners Network Services, LLC
Bank Name: Bank of America
Account Number: 4970820112
ABA Number: 026009593

Congratulations on earning your Premier Partner discount of 0% on eligible products! Once you reach \$40,000 in monthly recurring revenue your status will be upgraded to Elite and you will earn a 15% discount on eligible products.

If you need any pre-sales support to help you reach the Premier Partner level, please let us know!

Item	Description	Quantity	Cost/Unit	Recurring/Other/Fees	Taxes	Discount	Total
1	Enterprise Premium Active Seat(s)	3.00	25.990	77.97			77.97
2	Enterprise Premium Active Seat(s) (12-mo Term)	149.00	24.990	3,723.51			3,723.51
3	900 Numbers Active Seat(s)	90.00	2.990	269.10			269.10
4	Enterprise Standard Active Seat(s) (12-mo Term)	46.00	19.990	919.54			919.54
5	Add'l DID(1-100) Active Seat(s)	327.00	0.500	163.50			163.50
6	Auto Attendant Active Seat(s)	46.00	9.990	459.54			459.54
7	Voicemail Active Seat(s)	32.00	2.990	95.68			95.68
8	E911 Surcharge Active Seat(s)	55.00	2.500	137.50			137.50
9	IPTrunking-SMB Active Seat(s) (12-mo Term)	44.00	15.000	660.00			660.00
10	IPCallRecord Basic Active Feature(s)	7.00	23.000	161.00			161.00
11	IP FaxSolution Active Seat(s)	13.00	6.990	90.87			90.87
12	Enterprise Basic Active Seat(s) (12-mo Term)	1.00	14.990	14.99			14.99
13	Enterprise Premium Active Seat(s)	12.00	25.990	311.88			311.88
14	Broadworks Call Center Opt 2 Active Seat(s)	1.00	25.000	25.00			25.00
15	Auto Attendant Active Seat(s) (12-mo Term)	21.00	7.990	167.79			167.79
16	Alternate Number Active Seat(s)	5.00	3.490	17.45			17.45
17	Enterprise Standard Active Seat(s)	6.00	20.990	125.94			125.94
18	IPSelect Lines Active Seat(s) (12-mo Term)	172.00	26.990	4,642.28			4,642.28
19	IPSelect Extensions Active Seat(s)	236.00	12.990	3,052.85			3,052.85
20	Linksys1 Active Line(s)	2.00	15.000	30.00			30.00
21	Linksys1 911 Active Seat(s)	1.00	10.000	10.00			10.00
22	Broadsoft Assistant Active Seat(s)	9.00	1.250	11.25			11.25
23	IPFax Overage Activation(s)	170.00	0.070	11.90			11.90
24	Hunt Group Active Seat(s)	30.00	7.990	239.70			239.70
25	Auto Attendant Active Seat(s)	3.00	9.990	29.97			29.97

37	Broadsoft Receptionist SMB Active Seat(s)			359.78		359.78
38	IPTrunking Basic - 1000 Flat Active Seat(s) (12-mo Term)	24.00	14.990			249.90
39	IPTrunking Basic - Unlimited Active Seat(s)	10.00	24.990	249.90		
40	Instant Group Calling Active Seat(s)	1.00	8.990	8.99		8.99
41	LNP Charge (less than 500) Activation(s)	1.00	4.000	4.00		4.00
42	Enterprise Standard Prorated First Month (12-mo Term)			121.27		121.27
43	Enterprise Basic Prorated First Month (12-mo Term)			2.00		2.00
44	PriorityAccessT1 -12 Active Seat(s)			7,708.49		7,708.49
45	Conference Bridge Calling			105.31		105.31
46	Inbound Toll Free Calls			5,504.49		5,504.49
47	International Calling			177.29		177.29
48	Directory Assistance Calling			21.00		21.00
49	Long Distance Calling			8.36		8.36
50	PriorityAccessT1 -12 Prorated First Month			145.89		145.89
51	PriorityAccessT1 -12 Activation(s)			865.00		865.00
52	Call Control Toolbar - MRC Prorated First Month			2.50		2.50
53	IPSelect Extensions Prorated First Month			67.54		67.54
54	Auto Attendant Prorated First Month			19.64		19.64
55	E911 Surcharge Prorated First Month			4.92		4.92
56	Class 5 Feature Package Prorated First Month			6.12		6.12
57	Add'l DID(1-100) Prorated First Month			0.50		0.50
58	IPSelect Extensions Prorated First Month (12-mo Term)			21.58		21.58
		Totals				36,519.60

Item	Description	Quantity	Cost/Unit	Recurring/Other Fees	Taxes	Discount	Total
26	IPSelect Lines Active Seat(s)	7.00	27.990	195.93			195.93
27	IPSelect Lines Active Seat(s)	7.00	27.990	195.93			195.93
28	Call Control Toolbar - MRC Active Seat(s)	5.00	1.250	6.25			6.25
29	IPSelect Extensions Active Seat(s) (12-mo Term)	271.00	11.990	3,249.29			3,249.29
30	Receptionist Console Opt 1 Active Seat(s)	1.00	35.000	35.00			35.00
31	Broadworks Call Center ACD Active Seat(s)	6.00	39.990	239.94			239.94
32	DID Reservation Active Seat(s)	3.00	0.500	1.50			1.50
33	Instant Group Calling Active Seat(s) (12-mo Term)	1.00	6.990	6.99			6.99
34	Class 5 Feature Package Active Seat(s)	13.00	3.990	51.87			51.87
35	Broadsoft Receptionist Enterprise Active Seat(s)	1.00	59.990	59.99			59.99
36	IPTrunking Basic - Unlimited Active Seat(s) (12-mo Term)	66.00	28.990	1,583.34			1,583.34
				39.99			39.99